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Attorney for Debtors Jamie
 Thomas and James Thomas

UNITED STATES BANKRUPTCY COURT
 EASTERN DISTRICT OF CALIFORNIA
 FRESNO DIVISION

In re:)
) Case No.: 2011-10912
)
) DCN: KB-5
 JAMIE THOMAS and)
)
 JAMES THOMAS,) Chapter 11
)
) DATE: May 25, 2011
) TIME: 2 P.M.
) Loc: 1300 18th St., First
) Floor, Bakersfield, CA
 Debtors.) Judge: Whitney Rimel

**NOTICE OF HEARING ON MOTION TO VALUE COLLATERAL (28710
 Gleneagle Court, Tehachapi, CA 93561)**

TO AMERICA'S WHOLESALE LENDER, JP MORGAN CHASE BANK, N.A., OR
 THEIR SUCCESSORS IN INTEREST AND ATTORNEYS OF RECORD, IF ANY,
 AND THE UNITED STATES TRUSTEE.

PLEASE TAKE NOTICE that a hearing on the Motion to Value
 Collateral (28710 Gleneagle Court, Tehachapi, CA 93561) filed by

Notice of Hearing

1 Jamie Thomas and James Thomas, will be heard by the Honorable
2 Judge Rimel on May 25, 2011 at 2 P.M. at 1st Floor, 1300 18th St.,
3 Bakersfield, CA.

4 Debtors are seeking a determination by the Bankruptcy Court
5 that the value of the single family real property located at
6 28710 Gleneagle Court, Tehachapi, CA 93561 ("Property") is
7 \$390,000.

8 Debtors own the Property, which is secured by a first deed
9 of trust from America's Wholesale Lender and a second deed of
10 trust from JP Morgan Chase Bank, N.A..

11 The motion seeks a determination by the Bankruptcy Court
12 that (1) the value of the Property is \$390,000; (2) The amount
13 of the claim held by JP Morgan Chase Bank, N.A. secured by the
14 second deed of trust is \$0.00 for purposes of the Chapter 11
15 case; and (3) The claim secured by the second deed of trust
16 against the Property is a general unsecured claim for the
17 purposes of Debtors' Chapter 11 Plan.

18 This Notice of Motion is filed and served pursuant to 11
19 U.S.C. §506, the Federal Rules of Bankruptcy Procedure, Rule
20 3012, and Local Rules for the U.S. Bankruptcy Court for the
21 Eastern District of California. Opposition to the granting of
22 the Motion must be (1) in writing; (2) served on the parties
23 identified in Exhibit "A" attached hereto; and (3) filed with
24 the Court by the responding party at least fourteen (14)
25 calendar days preceding the date of the hearing pursuant to
26 Local Rule 9014-1(f)(1). The Court may not hear opposition to
27 the Motion at oral argument if written opposition to the Motion

28 Notice of Hearing

1 has not been timely filed. Failure to timely file written
2 opposition may be deemed a waiver of any opposition to the
3 granting of the Motion or may result in the imposition of
4 sanctions pursuant to Local Rule 9014-1. **Further the Court may**
5 **resolve the matter without oral argument unless written**
6 **opposition and supporting evidence are filed with the Clerk of**
7 **Court and served on the moving party, and the Court may strike**
8 **any written opposition that is not timely filed and served.**

9 The Motion is based on this Notice of Hearing, the Motion,
10 the Exhibits, the Request for Judicial Notice, and the Proof of
11 Service of the Motion, all filed concurrently with this Notice.
12 The Motion is also based on any documents filed in reply as well
13 as arguments presented at the hearing.

14
15
16 Date: April 18, 2011

17
18 By: /s/ Kirk Brennan

19 Kirk Brennan, attorney for Debtors in Possession
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27

28 Notice of Hearing

Jamie Thomas

James Thomas

28710 Gleneagle Court

28710 Gleneagle Court

Tehachapi, CA 93561

Tehachapi, CA 93561

U.S. Trustee

Kirk Brennan, esq.

Office of the U.S. Trustee

21250 Hawthorne Blvd.

United States Courthouse

Suite 500

2500 Tulare Street, Room 1401

Torrance, CA 90503

Fresno, CA 93721

Exhibit "A"

Notice of Hearing